

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Project Name: 2011 annual Comprehensive Plan amendments

Applicant Name: City of Seattle - Department of Planning and Development

Address of Proposal: Citywide as well as several specifically identified locations

SUMMARY OF PROPOSED ACTION

The Department of Planning and Development (DPD) is forwarding a range of proposed amendments to the Comprehensive Plan (CP) to the City Council and Mayor. This is part of an annual process whereby contents of the Comprehensive Plan such as Element sections, goals, policies, and designations may be revised. The thirteen proposed amendments, identified by letters A - M, address topics including land use, transportation, annexation, environment, changes to the Future Land Use Map, and addition of a new "Container Port Element."

The following approval is required:

SEPA - Environmental Determination - Chapter 25.05, Seattle Municipal Code.

SEPA DETERMINATION: ☐ Exempt ☒ DNS ☐ MDNS ☐ EIS
☐ DNS with conditions
☐ DNS involving non-exempt grading, or demolition,
or another agency with jurisdiction.

Background

The annual amendment process for the City's Comprehensive Plan includes DPD's review of proposals for amendments that are submitted by the public and agencies. DPD is advancing several amendment proposals for decisionmaking to the City Council and Mayor. DPD makes its recommendations on whether or not to adopt the proposed amendments (some are not recommended) and through its evaluative process has revised some of the amendments originally submitted by others; the amendments, as formulated and recommended by DPD and sent for decisionmaking to the City Council, are evaluated in this SEPA review.

The Proposal

The range of proposed 2011 Comprehensive Plan amendments is summarized as:

- A. Add a new Container Port Element to the CP, which would contain goals and policies for container ports, as required by state law, per a 2009 Growth Management Act amendment. This is intended to address freight mobility and land use compatibility topics related to industrial lands.
- B. Amend the Transportation Element to add the planned “Lake to Bay Loop” to the CP’s urban trails system map.
- C. Amend several policies of the Environment Element to be consistent with the Urban Forestry Management Plan and the current citywide approach to managing the urban canopy. Affects policies E9.5, E10.1, E23 and E24; includes changes to eliminate duplicate policies.
- D. Amend the Future Land Use Map (FLUM), consistent with direction in Resolution 31291, to remove an area generally known as “South of Charles Street” from the Greater Duwamish Manufacturing & Industrial Center (MIC) and to change the FLUM designation of the area from Industrial to Downtown.
- E. The amendment on greenhouse gas reduction targets originally proposed as Item E is proposed to be deferred to a future year.
- F. The amendment originally proposed as Item F is proposed with different wording in a new policy in the Human Development Element, Policy 11.1, “Support and guide the operation of safe and healthy transitional encampments to temporarily address homelessness in the city.”
- G. Amend the FLUM for an area east of 15th Avenue NW between NW 51st Street and NW 48th Street, to remove the area from the Ballard Interbay Northend MIC, and to change the designation from “Industrial Area” to “Commercial/Mixed Use Area.”
- H. Amend the FLUM for property addressed as 1600 W. Armory Way in Interbay, to remove the area from the Ballard Interbay Northend MIC, and to change the designation from “Industrial Area” to “Commercial/Mixed Use Area.”
- I. Amend the FLUM for property addressed as 2130 Harbor Avenue SW to remove the area from the Greater Duwamish MIC, and to change the designation from “Industrial Area” to “Commercial/Mixed Use Area.”
- J. Amend the FLUM for two parcels of property addressed as 1009-1011 NE 73rd St in the Roosevelt Residential Urban Village from “Single Family Residential Area” to “Commercial/Mixed Use Area.”
- K. Amend the FLUM designation for property near Interstate 5 and Ravenna Boulevard in the Roosevelt Residential Urban Village from “Single Family Residential Area” to “Multifamily Residential Area.”

- L. Amend Figure 9 of the Urban Village Element, which portrays potential annexation areas, to add an area in the South Park neighborhood known as the “Sliver by the River” and delete the southern portion of the unincorporated area of North Highline that has been annexed by the City of Burien.
- M. The amendment originally proposed as Item M is proposed with different wording that would amend the Transportation Element by revising Policy T8 as follows:

T8 Pursue strategies to reduce and help prevent road damage from heavy vehicles. Establish a street system that can accommodate the weight of heavy vehicles and reduce the damage such vehicles cause.

Public Comment

The proposed amendments require City Council approval. Public comment will be taken on the proposed amendments at a future City Council Public Hearing.

ANALYSIS - SEPA

This proposal is an adoption of legislation that would amend the City’s Comprehensive Plan, which is defined as a non-project action. This action is not categorically exempt (SMC 25.05.800). A threshold determination is required for any proposal that meets the definition of “action” and is not categorically exempt.

The disclosure of the potential impacts from this proposal was made in an environmental checklist submitted by the applicant dated October 31, 2011. The information in the checklist, the Director’s Report and Recommendation, other information provided by the applicant, and the experience of the lead agency with review of similar regulations and proposals, form the basis for this analysis and decision.

The impact discussion is oriented toward evaluating the potential for adverse (e.g., negative) impacts that could arise, and their relative magnitude and potential significance to the identified elements of the environment based on the proposal described above. However, some positive impact implications are mentioned as well to adequately represent the intents and the probable outcomes of the proposed amendments.

ELEMENTS OF THE ENVIRONMENT

Adoption of the recommended Comprehensive Plan amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below evaluates the potential long-term adverse environmental impacts that might conceivably result from future development relevant to the proposal.

Natural Environment

Earth, Air, Water, Plants & Animals, Environmental Health

Item A – New Container Port Element:

No significant adverse impact potential is identified. Potentially, if the Element is successful in supporting efficient freight mobility and land use compatibility, it could contribute to positive impacts by lessening air pollutant emissions and resulting in lesser exposure of neighboring uses to such impacts.

Item B – Add “Lake to Bay Loop” to urban trails map:

No significant adverse impact potential is identified for this added trail designation.

Item C – Revise environmental policies per Urban Forestry Management Plan:

No significant adverse impact potential is identified. To the extent that policy amendments lead to improved future tree canopy conditions, impacts could be positive in nature.

Item D – Remove “South of Charles Street” vicinity from the Greater Duwamish MIC and add to Downtown Urban Center:

The affected properties could have existing environmental hazard conditions due to past pollution or uses, and the area is also located adjacent to other industrially-used properties and Interstate 5 and Interstate 90. Thus, if this designation was changed and rezones to Downtown zones occurred, future potential residential uses could be subject to air quality effects from neighboring uses and streets/highways, and/or require site cleanup prior to development. These are evaluated as potential adverse natural environmental impacts with future development, but not as significant adverse impacts due to the availability of mitigation strategies that, if needed, could be required.

Item E – Adjust air emissions goals/policies:

This item is proposed to be deferred. Thus, no potential for significant adverse impacts to these natural environmental elements is identified.

Item F – New policy on supporting and guiding operation of safe and healthy homeless encampments:

This item does not include particulars that would alter the future possible location of homeless encampments, and supports safety and health in encampments. Thus, no specific added potential for environmental impacts of these kinds is identified.

Item G – Remove from BINMIC and change FLUM designation for 15th Ave NW between 48th and 51st Sts, from Industrial to Commercial/Mixed Use:

Some of the affected properties could have existing environmental hazard conditions due to past pollution, and the area is also located adjacent to other industrially-used properties and the 15th Avenue NW arterial. Thus, if this designation was changed and rezones occurred, future development that included residential uses could be subject to air quality effects from streets or neighboring uses, and/or require site cleanup prior to development. These are evaluated as potential adverse natural environmental impacts with future development, but not as significant adverse impacts due to the availability of mitigation strategies that, if needed, could be required.

Item H – Remove from BINMIC and change FLUM designation for 1600 W Armory Way property in Interbay, from Industrial to Commercial/Mixed Use:

This property is subject to existing conditions similar to those described for Item G, along with nearby rail operations, with a resulting interpretation of potential for adverse but not significant adverse natural environmental impacts of these kinds. The potential use of mitigation strategies would also be comparable.

Item I – Remove from Greater Duwamish MIC and change FLUM designation for 2130 Harbor Ave SW, from Industrial to Commercial/Mixed Use:

This property could be subject to existing conditions similar to those described for Items G and H, with a resulting interpretation of potential for adverse but not significant adverse environmental impacts. However, future development in this area could also be at greater risk of generating additional increments of adverse environmental impacts upon marine habitats, due to its location near Elliott Bay.

Item J – Change FLUM designation for 1009 and 1011 NE 73rd St in Roosevelt Urban Village, from Single Family to Commercial/Mixed Use:

No significant adverse impact potential is identified. To the extent that future development occurs with denser commercial or mixed uses, additional traffic volumes and potential emissions from such uses would contribute slightly to air pollutant emissions in this vicinity, and additional land disturbance would occur during construction.

Item K – Change FLUM designation for properties on 8th Ave NE in Roosevelt Urban Village, from Single Family Residential to Multifamily Residential:

No significant adverse impact potential is identified. To the extent that future development occurred with denser multifamily uses, additional traffic volumes and potential emissions from such uses could contribute slightly to air pollutant emissions in this vicinity, and additional land disturbance would occur during construction. Also, this vicinity would be exposed to probable air pollutant emissions from the adjacent I-5 freeway.

Item L – Amend future annexation map to include “Sliver by the River” in South Park vicinity, and delete other portion:

No significant adverse impact potential is identified.

Item M – Amend Transportation Element to support pursuit of strategies to reduce and prevent heavy vehicle damage:

To the extent that the policy successfully discourages actual road damage, it could lead to minor reductions in dust and other air pollutants generated by traffic on damaged city streets. Also, given the relative equivalence to the intent of existing Policy T8, no added potential for impacts is identified.

Built Environment

Land Use, Height/Bulk/Scale, Housing, Aesthetics, Noise, Light/Glare, Historic Preservation, Energy, Public View Protection, Shadows on Open Spaces

Item A – *New Container Port Element:*

No significant adverse impact potential is identified. The new Element could contribute to long-term improved levels of consistency in land use patterns with the goals and objectives of the City's Comprehensive Plan, in that port and related transport or industrial use purposes could be further reinforced and prioritized. Although the port-related activities generate noise and light and consume energy, the new Element is not likely to lead to meaningful increases in adverse environmental impacts of these kinds.

Item B – *Add “Lake to Bay Loop” to urban trails map:*

No significant adverse impact potential is identified for this mapping of a planned trail.

Item C – *Revise environmental policies per Urban Forestry Management Plan:*

No significant adverse impact potential is identified. Improved performance with respect to meeting this plan's objectives would improve landscaping and greening of the built environment over time, thus improving overall aesthetics without a significant impairment of any particular land use, housing or building design pattern.

Item D – *Remove “South of Charles Street” vicinity from the Greater Duwamish MIC and add to Downtown Urban Center:*

Over the long-term, the current zoning of this area would encourage a probable denser commercial/industrial employment center to evolve, augmenting its current land use pattern that includes a BMW dealership, City utility yard, and mix of other commercial/industrial uses. This could include a substantial amount of office development that would further complement and enliven the south portion of the Chinatown/International District (I.D.) neighborhood. This could occur with or without any change in the area's FLUM designation to Downtown. Other policies in the CP support retention of lands in the Greater Duwamish MIC, thus suggesting that removing industrial zoned lands from it through redesignation would be considered an adverse outcome in relationship to land use plans and policies.

It is not certain whether a designation change would lead to rezones that accommodate residential uses, but if it did, the potential residential presence could be subject to compatibility impacts in terms of potential exposure to noisy activities occurring on other nearby properties or nearby transportation systems. This is identified as a potential adverse land use impact but not a significant adverse impact; remedies such as triple-pane windows and other building design elements would be possible to reduce such impacts.

Item E – *Adjust air emissions goals/policies:*

This item is proposed to be deferred. However, if it was proposed in final decisionmaking to proceed, no potential for significant adverse impacts to these built environmental elements is identified.

Item F – New policy on supporting and guiding operation of safe and healthy homeless encampments:

This item does not include particulars that would alter the future possible location of homeless encampments, and supports safety and health in encampments. Thus, no specific added potential for built environmental impacts of these kinds is identified.

Item G – Remove from BINMIC and change FLUM designation for 15th Ave NW between 48th and 51st Sts, from Industrial to Commercial/Mixed Use:

This subarea contains a variety of commercial and industrial uses and is partly located along a major arterial that predominantly has commercial uses along it. The interiors of the affected blocks currently contain a varied commercial/industrial land use pattern, and are part of the BINMIC area that extends north, east and south of this location. While a redesignation to Commercial/Mixed Use Area and subsequent rezone would accommodate a future commercial-use infill pattern that would be suited to this location along 15th Avenue NW, it would also create potential for increased residential presence in mixed-use developments. In the worst-case, such residential uses could generate compatibility conflicts with other industrial uses, perhaps related to noise or light/glare. This is identified as a potential adverse land use impact but not a significant adverse impact; remedies such as triple-pane windows would be possible to reduce such impacts. Other policies in the CP support retention of lands in the BINMIC, thus suggesting that removing industrial zoned lands from it through redesignation would be considered an adverse outcome in relationship to land use plans and policies.

Item H – Remove from BINMIC and change FLUM designation for 1600 W Armory Way property in Interbay, from Industrial to Commercial/Mixed Use:

Identified land use relationships and potential impacts are similar to those discussed for Item G above. This area is relatively close to the Interbay Port of Seattle Terminal 91 and railroad lines, and so might be subject to higher degrees of operational noise impacts than the area addressed in Item G, if residential uses would be present. Conclusions regarding the potential for adverse impacts are otherwise the same as identified for Item G.

Item I – Remove from Greater Duwamish MIC and change FLUM designation for 2130 Harbor Ave SW, from Industrial to Commercial/Mixed Use:

Land use relationships and potential impacts of residential and industrial incompatibilities are similar to those discussed for Item G above. However, the potential for future residential uses to be built would arguably be greater, and the potential for adverse land use incompatibilities could be more severe, due to the nature and scale of port-related activities occurring nearby, the nature of the probable residential uses, and the potential for spillover impacts onto residential uses. Namely, nighttime noise and light/glare would be the most probable sorts of impacts upon residential uses if such uses were authorized nearby to the port. The potential for residential complaints about port operations would itself represent a risk factor for land use incompatibilities that is a kind of adverse land use impact that might threaten the port's ability to operate in an efficient manner, with resulting economic consequences. Given the CP's intent to support the economically important port-related activities in these areas, a redesignation in a way that would support potentially-conflicting residential uses nearby would be inconsistent with the intent of land use policies in the CP that relate to this vicinity.

Item J – Change FLUM designation for 1009 and 1011 NE 73rd St in Roosevelt Urban Village, from Single Family to Commercial/Mixed Use:

This designation would probably lead to future development that would increase the adjacency of approximately three other single-family properties to increased-intensity development patterns. This would increase the potential for adverse land use impacts related to height/bulk/scale and land use compatibility by extending the commercial corridor further east into the remaining portion of the block that contains only single-family houses. Although this would occur in a confined vicinity, the localized degree of adverse impact is interpreted to be minor-to-moderate due to the proximity of other single-family homes, and the conversion of single-family residential property to a denser mixed-use pattern.

Item K – Change FLUM designation for properties on 8th Ave NE in Roosevelt Urban Village, from Single Family Residential to Multifamily Residential:

This proposed designation change would generate only a minor potential for adverse land use impacts, due to the edge condition created by the presence of I-5, the park-and-ride lots below it, and Ravenna Boulevard, and the ensuing low probability of compatibility or height/bulk/scale impacts on neighboring properties or blocks. The Single Family designation appears to be outdated, because the subject area is functionally already part of the Roosevelt core area which has multifamily and commercial zones, and it is divided from other single-family areas by I-5, and it is adjacent to other properties already designated and zoned for Multifamily Residential uses.

Item L – Amend future annexation map to include “Sliver by the River” in South Park vicinity and delete other portion:

No significant adverse impact potential is identified. The area’s eventual annexation could encourage eventual improvements and infill development near the Duwamish River, which could augment neighborhood quality and vitality.

Item M – Amend Transportation Element to support pursuit of strategies to reduce and prevent heavy vehicle damage:

No significant adverse impact potential is identified regarding these elements of the built environment.

Transportation, Parking, Public Services/Facilities, Utilities

Item A – New Container Port Element:

No significant adverse impact potential is identified with regard to transportation, parking, public services/facilities or utilities. To the extent that the new Element fosters improved freight mobility (helping to justify funding for infrastructure improvements, for example) and better accessibility in the transportation system and discourages incompatible land uses in affected areas, it could help avoid adverse traffic conditions and contribute to overall improved traffic conditions in the port’s vicinity.

Item B – Add “Lake to Bay Loop” to urban trails map:

No significant adverse impact potential is identified.

Item C – *Revise environmental policies per Urban Forestry Management Plan:*

No significant adverse impact potential is identified.

Item D – *Remove “South of Charles Street” vicinity from the Greater Duwamish MIC and add to Downtown Urban Center:*

No significant adverse impact potential is identified. This area’s current zoning encourages future redevelopment with denser commercial office and/or industrial uses. A redesignation to be in the Downtown Urban Center conceivably could lead to rezones for added development capacity that might include residential uses. If this occurs, there would be an added potential for future increases in transportation, parking, public services and utility demands that would potentially generate adverse environmental impacts upon those systems. The Livable South Downtown EIS has previously studied and quantified the potential for impacts at a programmatic level. Added density in this vicinity would not have substantial impact potential upon the area except area traffic would contribute to volumes on S. Dearborn Street, adding to congestion that in the worst-case could reach LOS E of F levels over the long-term.

There would be no substantial concern about the ability of police and fire public services to serve future possible residents. More analysis would be needed to identify precise kinds of utility improvements that might be needed with increased potential development including residents. However, in the worst case, there would only be an incremental added potential for utility systems improvement needs, and the applicants for future development would be responsible to pay for all or a proportionate share of any larger improvements if needed.

Item E – *Adjust air emissions goals/policies:*

This item is proposed to be deferred. However, if it was proposed in final decisionmaking to proceed, no potential for significant adverse impacts to these built environmental elements is identified.

Item F – *New policy on supporting and guiding operation of safe and healthy homeless encampments:*

This item does not include particulars that would alter the future possible location of homeless encampments, and supports safety and health in encampments. Thus, no specific added potential for impacts to transportation, parking, public services/facilities or utilities is identified.

Item G – *Remove from BINMIC and change FLUM designation for 15th Ave NW between 48th and 51st Sts, from Industrial to Commercial/Mixed Use:*

A redesignation away from Industrial could lead to rezones for added development capacity that might include residential uses. If this occurs, there would be an added potential for future increases in transportation, parking, public services and utility demands that would potentially generate adverse environmental impacts upon those systems. This area has good access to arterials that are congested in peak hours, but the area’s street network could accommodate traffic from added development by distributing traffic on several streets in several directions, resulting in no probable anticipated

significant adverse impacts. However, depending upon the exact nature and location of future development, it would still be possible that future development could lead to localized impacts that would warrant adjustments to street conditions. These could be identified, per phased review, when future development proposals would undergo SEPA review. Utility systems are subject to variable existing conditions and capabilities in localized vicinities; additional detailed analysis is not warranted for this programmatic SEPA determination, but there is only a probable low potential for adverse utility impacts that would be able to be mitigated by improvements that could be identified by future project-specific reviews. No significant adverse impact potential is identified with respect to public service provision.

Item H – Remove from BINMIC and change FLUM designation for 1600 W Armory Way property in Interbay, from Industrial to Commercial/Mixed Use:

The overall potential for transportation, public service and utility impacts is similar to that discussed for Item G above. This vicinity is located near the 15th Avenue W arterial corridor, with only limited potential for adverse impacts related to transportation, public services and utilities.

Item I – Remove from Greater Duwamish MIC and change FLUM designation for 2130 Harbor Ave SW, from Industrial to Commercial/Mixed Use:

The overall potential for transportation, public service and utility impacts is similar to that discussed for Item G above. This vicinity is located near the Harbor Avenue SW corridor, which has a somewhat limited street capacity, but also has nearby access to the Spokane Street Viaduct. It is possible that localized utility improvements to serve future potential residential uses would be needed, but this could be analyzed in more detail in future possible site-specific SEPA reviews.

Item J – Change FLUM designation for 1009 and 1011 NE 73rd St in Roosevelt Urban Village, from Single Family to Commercial/Mixed Use:

Given the small size of this proposed redesignation, it has only a minor potential for generating adverse transportation, parking, utility and public service impacts. Future site-specific reviews, including SEPA reviews, would provide an opportunity to evaluate any improvements needed to fulfill typical street requirements or SEPA mitigation needs, if a rezone occurs, and if future development is proposed.

Item K – Change FLUM designation for properties on 8th Ave NE in Roosevelt Urban Village, from Single Family Residential to Multifamily Residential:

Given the limited size of this proposed redesignation, it has only a minor potential for generating adverse transportation, parking, utility and public service impacts. Future site-specific reviews, including SEPA reviews, would provide an opportunity to evaluate any improvements needed to fulfill typical street requirements or SEPA mitigation needs, if a rezone occurs, and if future developments are proposed. Factors that would influence traffic and parking analyses would include the area's adjacency to park-and-ride facilities, the I-5 corridor and proximity to the future light rail station at Roosevelt, which means there would be several transit travel options available to serve future development.

Item L –Amend future annexation map to include “Sliver by the River” in South Park vicinity and delete other portion:

No significant adverse impact potential is identified. To the extent that future annexations would lead to added responsibilities to provide roads, public services and utilities, the addition of another possible annexation area would add a minor degree of added potential for long-term impact upon City transportation, public service and utility infrastructure providers. The deletion of another portion from the map would have a commensurate reduction in the potential for such long-term impacts.

Item M – Amend Transportation Element to support pursuit of strategies to reduce and prevent heavy vehicle damage:

No significant adverse impact potential is identified, partly due to the relative equivalence of the proposed item to the existing language in Policy T8. To the extent that the policy is successful, it would encourage less overweight vehicle traffic and thus reduce the potential for damage to City roads and bridges. This would represent a positive type of environmental impact over the long term.

DECISION - SEPA

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(C).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(C).

Signature: (signature on file)
Gordon Clowers, Urban Planner 2
Department of Planning and Development

Date: October 31, 2011